

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	) BANKRUPTCY CASE NO. 11-17065-AMC
	)
Tracie Upchurch,	) CHAPTER 13
	)
Debtor.	) MOTION NO.
_____	)
Wilmington Savings Fund Society,	) <b>DATE OF HEARING: September 13, 2016</b>
FSB, doing business as Christiana	) <b>TIME OF HEARING: 2:00 p.m.</b>
Trust, not in its individual capacity, but	) <b>PLACE OF HEARING:</b>
solely as trustee for BCAT 2015-14BTT,	) <b>U.S. Bankruptcy Court</b>
by Fay Servicing, LLC, its Servicing	) <b>Robert N.C. Nix Federal Courthouse</b>
Agent,	) <b>Courtroom No. 5</b>
	) <b>900 Market Street</b>
Movant,	) <b>Philadelphia, PA 19107</b>
	)
vs.	)
	)
Tracie Upchurch, Debtor; and William	)
Miller, Trustee,	)
	)
Respondents.	)

**NOTICE OF MOTION, RESPONSE DEADLINE  
AND HEARING DATE**

Movant has filed a Motion for Relief from the Automatic Stay with the Court regarding real property located at 8044 Temple Road, Philadelphia, PA 19150.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**

1. If you do not want the court to grant the relief sought in the motion or if you want the Court to consider your view on the Motion, then on or before **September 6, 2016**, you or your attorney must do **ALL** of the following:
  - a) file an answer explaining your position at:

Clerk, U.S. Bankruptcy Court  
Robert N.C. Nix Federal Courthouse  
900 Market Street, Suite 400  
Philadelphia, PA 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

b) mail a copy to the Movant's attorney:

David W. Raphael, Esquire  
Grenen & Birsic, P.C.  
One Gateway Center, 9<sup>th</sup> Floor  
Pittsburgh, PA 15222  
Phone: 412-281-7650  
Fax: 412-281-1763  
E-mail: [draphael@grenenbirsic.com](mailto:draphael@grenenbirsic.com)

William Miller, Trustee  
1234 Market Street, Suite 1813  
Philadelphia, PA 19107  
E-mail: [ecfemails@ph13trustee.com](mailto:ecfemails@ph13trustee.com)

U.S. Trustee  
Office of the U.S. Trustee  
833 Chestnut Street, Suite 500  
Philadelphia, PA 19107  
E-mail: [USTPRegion03.PH.ECF@usdoj.gov](mailto:USTPRegion03.PH.ECF@usdoj.gov)

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the Court may enter an order granting the relief requested in the motion.
3. A hearing on the Motion is scheduled to be held before the Honorable Ashely M. Chan on September 13, 2016 at 2:00 p.m., in Courtroom No. 5, United States Bankruptcy Court, Robert N.C. Nix Federal Courthouse, 900 Market Street, Philadelphia, Pennsylvania, 19107.
4. If a copy of the Motion is not enclosed, a copy of the Motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
5. You may contact the Bankruptcy Clerk's office at 215-408-2800 to find out whether the hearing has been cancelled because no one filed an answer.

DATE: 8/22/16